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**TELEPHONE COMPANY**

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

PACIFIC BELL TELEPHONE COMPANY, a  
California Corporation,  
  
Plaintiff,  
  
v.  
  
ROSEBURG FOREST PRODUCTS CO., an  
Oregon Corporation,  
  
Defendant.

Case No. 2:23-cv-02892-KJM-CKD  
*Assigned to The Hon. Kimberly J. Mueller*  
  
**STIPULATION TO EXTEND TIME  
TO RESPOND TO COMPLAINT**  
**[LOCAL RULE 144]**

Pursuant to Local Rule 144, Plaintiff Pacific Bell Telephone Company (“AT&T”) and Defendant Roseburg Forest Products Co. (“Roseburg”) (hereinafter collectively “the Parties”) hereby stipulate and agree as follows:

WHEREAS, AT&T served the Summons and Complaint in this action on Roseburg on December 12, 2023;

WHEREAS, Roseburg’s response to AT&T’s Complaint was first due January 2, 2024;

1 WHEREAS, on December 28, 2023, the Parties agreed and stipulated to extend Roseburg's  
2 deadline to respond to the Complaint by 28 days (ECF No. 9);

3 WHEREAS, the Parties subsequently agreed and entered into a second stipulation to extend  
4 Roseburg's deadline to respond to the Complaint by an additional 45 days (ECF No. 10), which the  
5 Court ordered on January 26, 2024 (ECF No. 11), making the new deadline March 15, 2024;

6 WHEREAS, the Parties again agreed and entered into a third stipulation to extend Roseburg's  
7 deadline to respond to the Complaint by an additional 17 days (ECF No. 13), which the Court granted  
8 via a minute order issued on March 14, 2024, making the new deadline April 1, 2024;

9 WHEREAS, the Parties again agreed and entered into a fourth stipulation to extend Roseburg's  
10 deadline to respond to the Complaint by an additional 15 days (ECF No. 18), which the Court ordered  
11 on April 1, 2024 (ECF No. 19), making the new deadline April 16, 2024;

12 WHEREAS, the Parties again agreed and entered into a fifth stipulation to extend Roseburg's  
13 deadline to respond to the Complaint by an additional 15 days (ECF No. 20), which the Court ordered  
14 on April 17, 2024 (ECF No. 21), making the new deadline May 1, 2024;

15 WHEREAS, the Parties again agreed and entered into a sixth stipulation to extend Roseburg's  
16 deadline to respond to the Complaint by an additional 15 day (ECF No. 22), which the Court granted  
17 via a minute order issued on May 3, 2024 (ECF No. 23), making the new (and current) deadline  
18 May 16, 2024;

19 WHEREAS, the Parties, after conferring, now wish to extend Roseburg's current deadline to  
20 respond to AT&T's Complaint by an additional 15 days, making the new deadline May 31, 2024; and

21 WHEREAS, good cause exists to extend the deadline because (1) the Parties are working  
22 together to resolve the dispute without incurring undue litigation expenses and consuming additional  
23 resources, (2) the Parties require additional time to engage in settlement negotiations, (3) AT&T has  
24 furnished certain documentation to Roseburg regarding its claimed damages and then upon request,  
25 produced additional backup documentation, (4) the principals held a Zoom call on May 1, 2024 to  
26 discuss settlement and have exchanged proposals since that date, and (5) permitting Roseburg  
27 additional time to respond to AT&T's Complaint will help serve to accomplish this objective;

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1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through  
2 their respective counsel, that Roseburg may have an additional 15 days to respond to AT&T's  
3 Complaint, up to and including Friday, May 31, 2024.

4 IT IS SO STIPULATED.

6 **HUNTON ANDREWS KURTH LLP**

7 Dated: May 14, 2024

8 By: /s/ Scott P. DeVries

9 Scott P. DeVries

10 *Attorneys for Defendant*

11 *ROSEBURG FOREST PRODUCTS CO.*

12 **AT&T SERVICES, INC. LEGAL DEPT.**

13 Raymond P. Bolaños

14 **CROWELL & MORING LLP**

15 Thomas F. Koegel

16 Rebecca M. Suarez

17 */s/ Raymond P. Bolaños*

18 By: (as authorized on April 24, 2024)

19 *Attorneys for Plaintiff*

20 *PACIFIC BELL TELEPHONE COMPANY*

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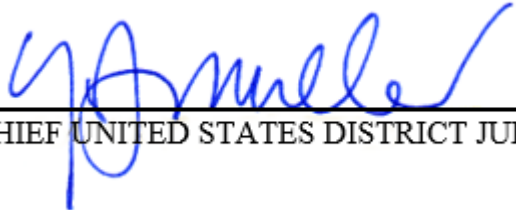
**ORDER**

Having reviewed the Parties' Stipulation and finding good cause, the Court hereby GRANTS the Stipulation and ORDERS as follows.

Roseburg is granted an additional 15 days of extension to respond to AT&T's Complaint, up to and including May 31, 2024. This is the parties' seventh stipulation to extend time. No further extensions will be granted absent a detailed showing of extraordinary cause.

IT IS SO ORDERED.

Dated: May 20, 2024.

  
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CHIEF UNITED STATES DISTRICT JUDGE

Hunton Andrews Kurth LLP  
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